



ORIGINAL

EX PARTE OR LATE FILED

RECEIVED

NOV 17 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 17, 2000

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW A325  
Washington, D.C. 20554

**Ex-Parte**

*Re: Application by SBC Communications Inc. for Authorization Under Section 271 of  
The Communications Act to Provide In-Region, Interlata Service in the States of Kansas  
and Oklahoma. Docket No. 00-217*

Dear Ms. Salas:

Please find enclosed at the request of staff, one request for information with SWBT's responses as filed in the Oklahoma 271 investigation proceeding and one request for information with SWBT's response as filed in the Kansas state 271 investigation proceeding.

Sincerely,

Edwardo (Eddie) Rodriguez

Attachment

No. of Copies rec'd 0  
List A B C D E

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF THE ATTORNEY )  
GENERAL OF THE STATE OF )  
OKLAHOMA, AT&T COMMUNICATIONS )  
OF THE SOUTHWEST, INC., BROOKS )  
FIBER COMMUNICATIONS OF TULSA, )  
INC., COX OKLAHOMA TELCOM, INC., )  
MCI TELECOMMUNICATIONS )  
CORPORATION, AND SPRINT )  
COMMUNICATIONS, L.P. TO EXPLORE )  
SOUTHWESTERN BELL TELEPHONE )  
COMPANY'S COMPLIANCE WITH )  
SECTION 271(C) OF THE )  
TELECOMMUNICATIONS ACT OF 1996 )

**RECEIVED**

NOV 17 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CAUSE NO. PUD 970000560

**SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE TO  
WOLDCOM, INC. AND ITS OKLAHOMA OPERATING  
SUBSIDIARIES' FIRST SET OF DATA REQUESTS**

Southwestern Bell Telephone Company ("SWBT") hereby provides its response to WorldCom, Inc. and its Oklahoma operating subsidiaries' first set of data requests, which consist of forty-seven (47) requests. SWBT's responses are attached hereto.

Respectfully submitted,

---

MARY W. MARKS, OBA # 5693  
TRAVIS M. DODD, OBA # 16827  
800 North Harvey, Rm. 310  
Oklahoma City, OK 73102  
Telephone: 405/291-6756

CURTIS LONG, OBA # 5504  
200 ONEOK Plaza  
100 West Fifth Street  
Tulsa, OK 74103-4240  
Telephone: 918/699-2959

ATTORNEYS FOR SOUTHWESTERN BELL  
TELEPHONE COMPANY

## CERTIFICATE OF SERVICE

On this \_\_\_\_ day of July, 2000, a true and correct copy of the foregoing was mailed, postage prepaid, and e-mailed to:

Maribeth Snapp  
Deputy General Counsel  
Oklahoma Corporation Commission  
P.O. Box 52000-2000  
Oklahoma City, OK 73152-2000

Kathleen LaValle  
Cohan, Simpson, Cowlshaw & Wulff  
2700 One Dallas Centre  
350 North St. Paul  
Dallas, TX 75201

Cece Coleman  
Deborah Morgan  
Assistant General Attorney  
112 State Capitol Building  
2300 N. Lincoln Blvd.  
Oklahoma City, OK 73105

J. Fred Gist  
Hall, Estill, Hardwick, Gable,  
Golden & Nelson  
100 North Broadway, Suite 2900  
Oklahoma City, OK 73102

Marc Edwards  
Phillips, McFall, McCaffrey,  
McVay & Murrah  
One Leadership Square, 12<sup>th</sup> Floor  
211 North Robinson  
Oklahoma City, OK 73102

Linda Oliver  
Jennifer Purvis  
Hogan & Hartson  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004

Jennifer Johns  
Cox Oklahoma Telcom, Inc.  
9 J.P. Murphy Highway  
West Warwick, RI 02893

Stephen F. Morris  
MCI Telecommunications Company  
701 Brazos, Suite 600  
Austin, TX 78701

Rachel Lipman-Reiver  
Sprint Communications Company, L.P.  
8140 Ward Parkway, 5E  
Kansas City, MO 64114

Michelle Bourianoff  
919 Congress Avenue, Suite 1500  
Austin, TX 78701-2444

Ronald E. Stakem  
Clark, Stakem, Wood & Douglas  
100 Park Avenue, Suite 400  
Oklahoma City, OK 73102

John Gray  
Logix Communications  
3555 N.W. 58, Suite 900  
Oklahoma City, OK 73112

Kathleen O'Reilly  
414 A Street, S.E.  
Washington, D.C. 20003

Katy Evans Parrish  
Cox Oklahoma Telcom, Inc.  
2312 N.W. 10<sup>th</sup> St.  
Oklahoma City, OK 73107

Nancy Thompson  
P.O. Box 18764  
Oklahoma City, OK 73154-8764

J. David Jacobson  
JACOBSON & LAASCH  
212 East Second Street  
Edmond, OK 73034

George Makohin  
7323 Waverly  
Oklahoma City, OK 73120

Ron Comingdeer  
Mary Kathryn Kunc  
6011 N. Robinson  
Oklahoma City, OK 73118-7425

Rina Y. Hartline  
Birch Telecom of Oklahoma, Inc.  
502 West 14<sup>th</sup> Street  
Austin, TX 78701

---

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-I.A(1)  
7/25/00

1-I.A(1)

**System Commonalties Within SWBT Region**

Is work from all states (Texas and "MOKA" – Missouri, Oklahoma, Kansas and Arkansas) processed in the same physical processing location on the same backend systems?

Response: The front end systems, LEX, EDI, DataGate and Verigate and LASR, are processed in Southwestern Bell's Dallas Data Center. The backend systems are identical systems processed in either the St. Louis Data Center or the Dallas Data Center. Texas orders and MOKA orders may be processed in either location.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-I.B(2)  
7/25/00

1-I.B(2)

**System Commonalties Within SWBT Region**

If processing location and backend systems in MOKA are not the same as in Texas, where are these systems physically located (city and state) and how do they differ by state?

Response: The front end systems, LEX, EDI, DataGate and Verigate and LASR, are processed in Southwestern Bell's Dallas Data Center. The backend systems are identical systems processed in either the St. Louis Data Center or the Dallas Data Center. Texas orders and MOKA orders may be processed in either location.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-I.C (3)  
7/25/00

1-I.C (3)

**System Commonalties Within SWBT Region**

If location and backend systems differ, what process is used to make sure that the software releases provide the same levels of functionality in each state across the region and are updated simultaneously?

Response: Systems located in the St. Louis and Dallas Data Centers are identical and are managed by common processes and personnel.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-I.D(4)  
7/25/00

1-I.D(4)

**System Commonalties Within SWBT Region**

If hours of System Availability are not identical for all systems in SWBT's five-state area, specify all differences.

Response: The hours of System Availability are identical, by system.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131



Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-I.E(5)  
7/25/00

1-I.E(5)

**System Commonalties Within SWBT Region**

If the St. Louis IS Call Center does not handle all technical inquiries for the five-state SWBT region, list other technical inquiry sources available to CLECs.

Response: The St. Louis IS Call Center handles all technical inquiries for the SWBT five-state region.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-II.A(6)  
7/25/00

1-II.A(6)

**Pre-Order**

If Business rules differ across the SWBT five-state area, provide those differences.

Response: Business rules do not differ across the SWBT five-state area; SWBT follows the same procedures and processes for the five states.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-II.B(7)  
7/25/00

1-II.B(7)

**Pre-Order**

If the backend systems that are used to return pre-order information differ among the SWBT five-state area, provide those differences.

Response: The systems are identical.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-II.C(8)  
7/25/00

1-II.C(8)

**Pre-Order**

If databases used in pre-ordering transactions (such as PREMISE) are not identical among SWBT's five-state area, provide all instances where they are not.

Response: The databases used in pre-ordering transactions are identical systems processed in either the St. Louis Data Center or the Dallas Data Center. Texas transactions and MOKA transactions may be processed in either location.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-II.D(9)  
7/25/00

1-II.D(9)

**Pre-Order**

If pre-order queries are not formatted the same across SWBT's five-state area,  
specify how they differ for each state.

Response: Formats for pre-order queries are identical across SWBT's five-state area.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.A(10)  
7/25/00

1-III.A(10)

**Ordering**

Are all Business rules the same across all five SWBT region States?

Response: Business rules for ordering are the same across all five SWBT region States;  
SWBT follows the same procedures and processes for all five states..

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.B(11)  
7/25/00

1-III.B(11)

**Ordering**

Are orders from all states (Texas and "MOKA" – Missouri, Oklahoma, Kansas and Arkansas) mechanically processed in the same physical processing location on the same backend systems?

Response: The front end systems are processed in Southwestern Bell's Dallas Data Center. The backend systems are identical systems processed in either the St. Louis Data Center or the Dallas Data Center. Texas orders and MOKA orders may be processed in either location.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

1-III.C(12)

**Ordering**

Specify if there are multiple processors used and any differences in the way orders are received by these processors or differences in processor performance that would affect order results.

Response: SORD is a software system that is processed on multiple processors (mainframe computers) located in the St. Louis and Dallas Data Centers. These processors for SORD are physically separate, but they run identical code. The same capacity planning procedures are used. There are no differences in the way orders are received by these processors and no differences in processor performance that would affect order results.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131



Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.D(13)  
7/25/00

1-III.D(13)

**Ordering**

If orders are mechanically processed in different locations, provide the locations (city, state) and detail of what orders or what geographical area is covered by each location.

Response: MOKA orders are generally processed on processors located in the St. Louis Data Center; Texas orders are generally processed on processors located in the Dallas Data Center.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.E(14)  
7/25/00

1-III.E(14)

**Ordering**

If there is not a single processing system, describe if all orders for all states are processed simultaneously, regardless of state or, if not, describe how orders are divided into different queues and processed (i.e. on a state-by-state basis or on some other basis).

Response: Seven regional SORD systems, four in the St. Louis Data Center and three in the Dallas Data Center, each utilizing identical code, process orders on a first come, first served basis, whether the orders are wholesale or retail.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.F(15)  
7/25/00

1-III.F(15)

**Ordering**

If they are divided into different queues and processed, describe how this happens.

Response: Orders are processed on a first come, first served basis, whether such orders are wholesale or retail orders. by region, on processors utilizing identical code. As soon as one order is distributed, the next service order is processed.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.G(16)  
7/25/00

1-III.G(16)

**Ordering**

Are all USOCs and FIDs the same state by state in the SWBT region?

Response: Yes, except where services may differ among states.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.H(17)  
7/25/00

1-III.H(17)

**Ordering**

If USOCs and FIDs differ by state in SWBT's five-state region, provide the difference by state and describe how SWBT makes this information available.

Response: Generally, the USOCs and FIDs are the same regardless of the state for the specific product. However, there may be state differences for certain billing components, such as 911 surcharges, line charges, and the like, that may be different by state. The USOC and FID information is available on the SBC CLEC website.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131

Docket No. PUD 970000560  
First Set of Requests  
WorldCom  
Request Number 1-III.I(18)  
7/25/00

1-III.I(18)

**Ordering**

Certain features are not available in all five states (i.e. Customer Choice is not available in Texas). List features that are only available in certain states.

Response: Customer Choice is a service available to retail customers, not a feature. Features are specific to switch types and release levels of the switch and do not vary among states. Functionality of the ordering processes is identical among states.

Responsible Person: Elizabeth Ham  
SWBT  
Vice President, Long Distance Compliance  
13075 Manchester Road, Room 256  
St. Louis, Missouri 63131